

(Extracted from IHS Report on Open Dumps on Indian Lands)

Allowable designations of solid waste site content include the following:

**Municipal Solid Waste (A):** means any *household, commercial/industrial, or institutional* solid waste that legally can be discarded in a municipal landfill under the provisions of the Resource Recovery and Conservation Act, (RCRA), "subtitle D and 40 CFR Subchapter I - Solid Wastes".

Municipal solid waste includes:

- Garbage and trash derived from households, multiple residences, hotels, motels and campgrounds.
- Commercial and industrial waste from stores offices, restaurants, warehouses, non-manufacturing activities at industrial facilities, and other similar establishments not meeting the definition of regulated hazardous wastes under subtitle C.
- Institutional wastes include material discarded by schools, hospitals, non-manufacturing activities at prisons, government facilities and other similar facilities.

Sites receiving limited quantities of hazardous or special waste from households shall not be excluded from this classification. This would generally include small amounts of paints, oil, non-segregated medical wastes, batteries, pesticides, and household chemicals that would be discarded in quantities typical of an individual household.

**Special Waste (B)** shall include solid or other wastes not specifically regulated as hazardous under subtitle C but which are considered to require special handling either due to regulation under other statutes or for worker safety. Segregated infectious and medical wastes, wood pallets, demolition wastes, asbestos materials, household appliances containing environmentally sensitive materials, sewage sludge, septic tank pumpings, motor vehicles/parts, segregated tire piles of 50 or more, and segregated piles of ten or more auto batteries should be included under this classification.

**Hazardous Waste (C)** shall include those materials listed by EPA under Subtitle C as hazardous. Regulated hazardous wastes are specifically listed in statute and regulations and generally have one or more of the following characteristics; ignitable, corrosive, reactive, or toxic. Small amounts of hazardous wastes as would be generated by households are excluded. This classification would generally be used when large quantities of segregated hazardous materials are encountered.

**Combined Wastes A + B** in evidence: notate category **(D)**

**Combined Wastes A + C** in evidence: notate category **(E)**

**Combined Wastes A + B + C** in evidence: notate category **(F)**

**Combined Wastes B + C** in evidence: notate category **(G)**

**HEALTH/ENV. THREAT:** Table A below may be used as a **guideline** for classifying the possible threat to health and environment posed by the solid waste site. Hazard points shall be derived from Table A and used in accordance with the point ranges and descriptors listed below thereby resulting in a high, moderate or low (H, M, or L) threat potential designation for the site. This guideline may be adjusted for Area specific conditions but the H, M, or L designations must be maintained. This Table is intended to be used as a tool in evaluating the site but the final determination of hazard potential should be based on professional judgment. Areas using other criteria are asked to attach a description of the adjustments upon submittal of the data.

|                         |                                |
|-------------------------|--------------------------------|
| <b>Low Hazard:</b>      | <b>Points total 13 or less</b> |
| <b>Moderate Hazard:</b> | <b>Points total 14-29</b>      |
| <b>High Hazard:</b>     | <b>Points total 30 or more</b> |

**Table A**

| <b>Hazard Point Factors</b>                            | <b>High Factors</b>   | <b>Moderate Factors</b>  | <b>Low Factors</b>   |
|--|---|--|--|
| <b>Contents</b>  | Site Waste Content<br><b>C, E, F or G</b><br>(30 points)                                      | Site Waste Content<br><b>All Categories Except A</b><br>(hazardous waste<br>< 2% by volume)<br>(15 points) | Site Waste Content<br><b>A</b> only                                |
| <b>Rainfall</b>  | high rainfall<br>(>25 in/yr)<br>(4 points)  | medium rainfall<br>(10-25 in/yr)<br>(2 points)   | low rainfall<br>(<10 in/yr)  |
| <b>Distance to drinking water aquifer</b>              | less than 50'<br>(30 points)  | 51' - 100' 10 points<br>101'-200' 8 points<br>201'-600' 4 points   | > 600'   |
| <b>Site Drainage</b>                                   | Site drainage increases the likelihood of ground or surface water contamination<br>(8 points) | Moderate drainage - limited ponding - drainage effects largely neutral<br>(2 points)                       | Site drainage contributes to protection of ground or surface water |
| <b>Potential to Create Leachate at Site</b>            | high probability<br>(4 points)  | moderate probability<br>(2 points)   | low probability  |
| <b>Distance to domestic water source</b>               | less than 1000 ft<br>(4 points)   | 1000 ft - 5000 ft<br>(2 points)  | >5000 ft   |
| <b>Site Accessibility</b>                              | Unrestricted Access - residences nearby<br>(less than 1 mile)<br>(4 points)                   | Unrestricted access but remote from population<br>(2 points)   | Restricted - controlled access                                     |
| <b>Frequency of Burning</b>                            | Frequent burning<br>(weekly)<br>(4 points)  | Infrequent burning<br>(monthly)<br>(2 points)  | Burning never occurs   |
| <b>Site Materials Exposure to Public &amp; Vectors</b> | surface materials, no cover, scavenging by public<br>(4 points)                               | materials in open trenches, limited scavenging<br>(2 points)   | materials are covered, no scavenging                               |
| <b>Degree of Public Concern over Site - Esthetics</b>  | Frequent expressions of public concern over the site<br>(4 points)                            | Little public concern - government awareness only<br>(2 points)  | No concern expressed by any entity                                 |